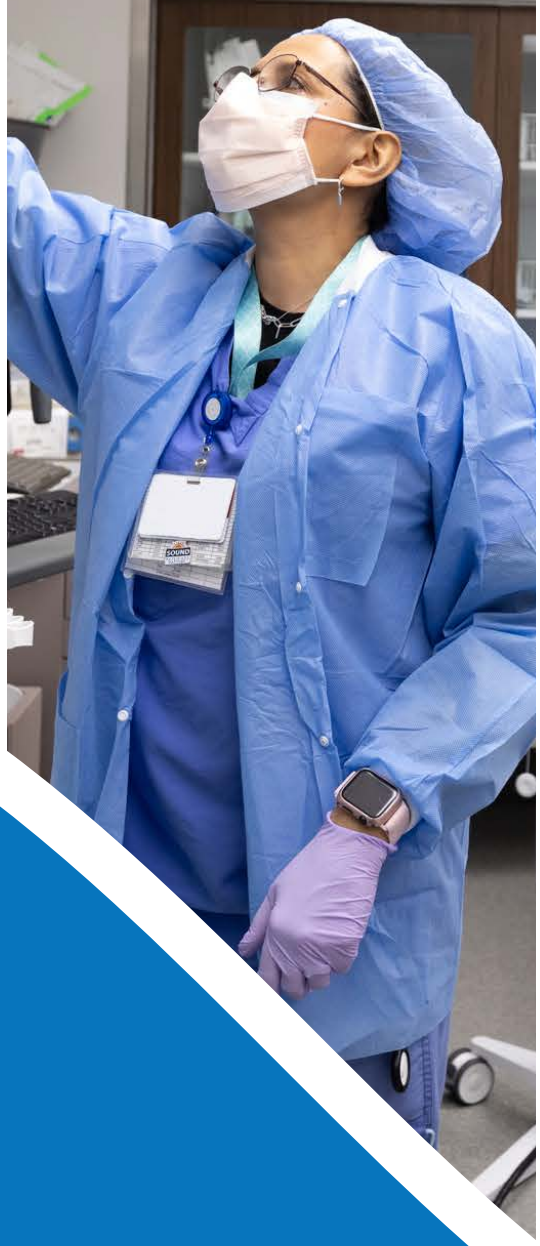






JPS Health Network
Fort Worth, Texas

Code of Conduct & Business Ethics

Our Commitment and Our Promise

In our journey at JPS Health Network, marked by continuous learning, growth, and an unwavering commitment to our patients and community, I am proud to witness our organization's development. As we evolve, our values remain the bedrock of who we are.

Commitment to Code of Conduct: At the heart of our organization is a steadfast commitment to upholding the principles outlined in our Code of Conduct ("Code"). These values permeate our interactions and guide our daily decision-making processes.

Celebrating Achievements: Our collective efforts have led to remarkable growth and meaningful partnerships within our community. Each of you contributes significantly to our success, and your dedication to providing exceptional patient care is truly commendable.

Understanding the Code: I urge you to familiarize yourselves with the Code. It encompasses essential information on our business practices, standards, and provides examples of common workplace scenarios. Additionally, you'll find valuable resources, including tips, policies, procedures, and contact numbers.

Reporting Concerns: Emphasized in our Code is the importance of speaking up when you observe unsafe practices, unethical behavior, or any violations. Reporting concerns in good faith reinforces our collective commitment to doing what is right. Your vigilance plays a crucial role in maintaining our standards.

Guidance and Support: While the Code is comprehensive, there may be unique situations it doesn't explicitly cover. In such cases, please seek guidance from your leader, Human Resources partner, or the Compliance Department.

Your dedication to JPS is invaluable, and I appreciate the hard work each of you contributes daily. Thank you for embodying our Code of Conduct and for your unwavering commitment to JPS Health Network.



Dr. Karen Duncan
President and Chief Executive Officer

Table of Contents

Our Mission, Our Vision, and Our Values 3
1. Introduction 5
1.1 Purpose of Our Code 6
1.2 Scope and Applicability 6
1.3 Our Leaders 6
2. Ethical Standards 7
2.1 Integrity and Honesty 8
2.2 Professionalism and Accountability 8
2.3 Respect and Dignity 8
2.4 Patient-Centered Care 8
2.5 Conflicts of Interest 9
2.6 Media and Public Relations 9
2.7 Fair Dealing in Procurement and Purchasing 10
2.8 Working with Doctors and Referrals 10
3. Compliance with Laws and Regulations 11
3.1 Legal Compliance 12
4. Confidentiality and Privacy 13
4.1 Handling Protected Health Information (PHI) 14
4.2 Confidentiality of Organizational Information 14
5. Patient Rights and Safety 15
5.1 Informed Consent and Patient Advocacy 16
5.2 Patient Safety Measures 16
6. Workplace Conduct 17
6.1 Non-Discrimination and Equal Opportunity 18
6.2 Harassment and Bullying Prevention 18
6.3 Substance Abuse 18
6.4 Professional Appearance and Dress Code 18
6.5 Gift Acceptance 18
6.6 Workplace Violence 19
6.7 Tobacco-Free Environment 19

7. Compliance Reporting and Investigation 20
7.1 Reporting Violations and Concerns 21
7.2 What to Report 22
8. Disciplinary Actions 24
8.1 Disciplinary Process 25
9. Education and Training 26
9.1 Compliance and Code of Conduct Training 27
9.2 Continuous Learning and Development 27
10. Acknowledgement of The Code 28
10.1 Acknowledgement 29
Our Resources 30
Phone Numbers and Intranet Links 31

Our Mission

Transforming healthcare delivery for the communities we serve.

Our Vision

To be a regional and national leader in:

- Improving the patient and family experience in healthcare
- Improving the quality and outcomes of population health
- Improving access to care



Our Values

In fulfilling our mission, we are guided by our values in practice.

Trust

We take pride in delivering services with the highest level of integrity.

Mutual Respect

We honor the ideas, beliefs, and diversity of others.

Excellence

We strive to surpass expectations by setting and achieving high standards of performance.

Integrity

We commit to demonstrating honesty and strong moral principles in all our actions, both within the workplace and with the public.

Accountability

We value the importance of keeping our promises and taking responsibility.





Our Shared Commitment

- Read the Code of Conduct and seek to understand how it applies to us.
- Refer to the Code of Conduct and JPS policies in all situations.
- Ask questions and report issues promptly.
- Complete required annual training.
- Attest to our commitment to the Code of Conduct.

Introduction





1.1 Purpose of Our Code

Our Code of Conduct and Ethics ("Code") guides Workforce Member actions and defines behavior expectations and ethical decision-making. It prioritizes legal compliance, reducing risks and safeguarding the hospital's reputation. It reinforces exceptional patient care and cultivates a positive, accountable workplace. By embracing this Code, you foster a healthcare environment of trust, respect, and excellence.

JPS Board of Managers ("Board") members, executives, employees, medical staff, officers, residents, students, trainees, contractors, vendors, volunteers, others under JPS who in the performance of work for JPS, and are under JPS' direct control (collectively, "Workforce Member") should use this Code as a roadmap to ensure their actions uphold our core values and adhere to the ethical and legal principles by which our institution must operate.

1.2 Scope and Applicability

JPS' Code applies to all Workforce Members and entities linked with our organization. It governs conduct within and outside JPS premises. Every individual, regardless of role, is responsible for upholding this Code.

1.3 Our Leaders

JPS leaders have an increased responsibility to reinforce the principles of the Code as part of our everyday work practice by:

- Setting a positive example for others
- Promoting the value and importance of the Code by modeling high ethical standards
- Ensuring employees understand the Code
- Being approachable and available so individuals feel comfortable asking questions and voicing concerns
- Quickly and effectively addressing issues that arise
- Promptly seeking help when needed by sharing concerns with the Compliance Department

Leaders are responsible for promptly reporting any legal and ethical concerns to the Compliance Department or the Human Resources Department as soon as they become aware.



Ethical Standards





2.1 Integrity and Honesty

Maintaining integrity and honesty is crucial for public trust in our hospital and the healthcare profession. We are transparent and accountable for our actions. We responsibly manage resources, reflecting our commitment to patients, colleagues, and the community.

2.2 Professionalism and Accountability

At JPS, we adhere to high standards of professionalism and accountability. Being accountable means owning up to mistakes, learning from them, and continuously improving. Upholding these standards builds trust in our community and sets the tone for excellence in healthcare delivery.

Every workforce member at JPS has a duty to deliver timely, appropriate care, and maintain accurate documentation of all interactions. Licensed healthcare professionals follow laws and guidelines set by their governing bodies and maintain all required licenses and certifications.

2.3 Respect and Dignity

Respect and dignity are an essential part of our Code. We highly value every person's worth and treat all with fairness, kindness, and empathy. We have an inclusive environment where differences are celebrated and everyone is treated respectfully. Upholding respect and dignity means actively listening, appreciating diverse perspectives, and ensuring considerate interactions. This fosters a culture where individuals thrive, teamwork excels, and patient care is compassionate and considerate.

2.4 Patient-Centered Care

Patient well-being is our priority at JPS. We involve patients in their care decisions, understanding their unique needs and values. Patient-centered care is our commitment; we place patients and their families at the core of their healthcare journey.





Ethical Standards

2.5 Conflicts of Interest

Workforce members at JPS must make decisions that are driven by the best interests of patients, the community, and the organization. A conflict of interest occurs when personal or financial interests might affect our professional judgment or services' integrity. We strictly follow our Conflicts of Interest policy, ensuring disclosure, assessment, and proper management of potential conflicts. If you think you may have a potential or actual conflict of interest, you have an obligation to report it promptly to the JPS Compliance Department, so that a determination can be made regarding the next steps.

Questions and Answers

Question: *I am a nurse. My family member owns a durable medical equipment (DME) business. Is it okay to refer or tell a JPS patient about these services?*

Answer: No. Promoting a family business to JPS patients is not permitted and it goes against policy.

Question: I *received a $100 gift card from a vendor that my department does business with as a "Thank You." Can I keep it?*

Answer: No, you may not keep it. Workforce members can never solicit or accept cash or cash equivalents (such as gift cards) from vendors. Workforce members who receive an unsolicited gift or other benefit prohibited by law may donate it to the JPS Foundation.

2.6 Media and Public Relations

At JPS, we are committed to providing clear and accurate communication. JPS pledges to provide information that's complete, fair, timely, and easy to understand. Media inquiries are to be directed to the JPS Communications Department, and JPS workforce members must not make individual comments outside of the Communications Department processes.

Workforce members cannot use JPS resources for political purposes unless allowed by law and approved by the JPS Chief Executive Officer (CEO). Personal political engagement is allowed but must occur on personal time and in a personal capacity, not on behalf of JPS. We must also make sure our political views do not interfere with and affect job performance and responsibilities.

Our Shared Commitment

- Protected Health Information (PHI), employee information and confidential business-related information and data cannot be posted to any social media site and/or any public forum.
- Refrain from using any JPS logos without prior written approval.
- Inaccurate information to patients, business partners, or the public can damage our reputation. When in doubt, seek guidance!

2.7 Fair Dealing in Procurement and Purchasing

JPS upholds fair practices in procurement. We are transparent and impartial in every purchasing step. Purchases are made honestly, focusing on merit, quality, and cost-effectiveness. We avoid bias and conflicts of interest, ensuring the process's integrity.

Our Shared Commitment

- We do not ask for or receive anything of value, directly or indirectly, in exchange for the referral of patients.
- We do not pay or offer to pay anyone, including workforce members, physicians, or other persons, for the referral of patients.
- We do not accept payment for referrals that JPS makes.

For More Information

Conflicts of Interest Program

LD 300* Conflicts of Interest for Employees Policy

2.8 Working with Doctors and Referrals

At JPS, we accept referrals based on patient needs, our ability to provide services, available resources, and the need for collaborative care. No financial transactions are involved in referrals – we neither pay for them nor accept payments for the referrals we make.



Compliance with Laws and Regulations





3.1 Legal Compliance

Workforce members are required to ensure legal compliance. This means following all laws and healthcare regulations. Failing to follow healthcare laws and regulations can result in serious consequences for you and JPS. Being compliant helps maintain our institution's trust and reputation. If unsure, consult the JPS Legal Department at **Legal@jpshealth.org**.



Our Shared Commitment

Always seek help when dealing with government officials on an audit or investigation inquiry. There are unique laws and requirements that apply to our organization and we are committed to conducting our business in accordance with the highest ethical principles. Contact the JPS Legal Department or JPS Compliance Department if you have a question.



For More Information

Question: *I received a subpoena on a legal matter. The investigator is requesting that I call them at the number provided. What should I do?*

Answer: If you receive an inquiry such as a search warrant, subpoena, or investigation, immediately contact the JPS Legal Department to determine the next steps.



Confidentiality and Privacy





4.1 Handling Protected Health Information (PHI)

At JPS, it is our responsibility to safeguard our patients' Protected Health Information (PHI). Members can access, use, and disclose PHI only if they need to access, use, or disclose the information to perform their JPS job duties. We strictly follow laws and rules regarding PHI, stressing the importance of consent before accessing or sharing health information. Members receive training to stay updated on best practices for handling PHI. We encourage quick reporting and resolution of any actual or suspected PHI breaches. Potential concerns should be promptly reported to the JPS Compliance Department.

4.2 Confidentiality of Organizational Information

All workforce members have a responsibility to maintain strict confidentiality concerning JPS internal matters, proprietary data, and sensitive information. Access to such data is limited to authorized workforce members who need the information to perform their JPS job duties.

Questions and Answers

Question: *My mom has asked me to review the results of a recent laboratory test. Since this is my family member, am I authorized to access her record to provide this information?*

Answer: No. Never access this information unless you are a member of the care team and provide this information in the normal course of providing care to the patient.

Question: *A patient arrived to the clinic and provided me with another patient's after visit summary (AVS). What should I do?*

Answer: Immediately report the incident to the Compliance Department. When there is a breach of Unsecured PHI, JPS must provide timely and appropriate notice to affected patients.

For More Information

PRV 100 Confidentiality of Healthcare Information

PRV 110 Administrative Safeguards

PRV 106 Use and Disclosure of Protected Health Information

PRV 115 Mitigation

PRV 119 PHI Breach Notification

Patient Rights and Safety





5.1 Informed Consent and Patient Advocacy

JPS prioritizes patient autonomy and informed consent. Before any medical procedure, it is important to ensure patients fully understand the procedure, its risks, benefits, and alternatives in order to make fully informed healthcare choices. Our goal is to establish a safe, supportive space where patients can express preferences and make informed decisions about their healthcare. Detailed guidelines on our commitment to patient advocacy can be found in the JPS Rights and Responsibilities of the Individual Policy and Procedure document.

5.2 Patient Safety Measures

JPS is committed to patient safety and has established safety measures to ensure that every patient receives care in an environment that prioritizes their well-being. These measures include training for all staff, stringent adherence to safety protocols, and continuous monitoring of healthcare practices. We actively identify and mitigate potential risks to enhance patient safety. Workforce members have a duty to report patient safety concerns and retaliation for reporting is prohibited. JPS has a clinical risk reporting system that is automated and efficient, allowing workforce members to document and track these events.

To report patient safety concerns, visit

jps/Intranet/Departments/Midas.aspx

and file a report with the JPS Quality Department.



Our Shared Commitment

- We are committed to respecting the dignity and rights of all our patients.
- We will acknowledge and adhere to JPS' Patient Rights and Responsibilities.
- We will share important information about a patient's care in a patient's or a patient's family members' preferred language, and in a clear, professional, and understandable manner.



For More Information

PRV 104 Patient Rights

PRV 103 Patient Permission

RI 1301 Communicating with Limited English and Sensory Impaired Persons Procedure

Workplace Conduct





6.1 Non-Discrimination and Equal Opportunity

We are devoted to a discrimination-free work environment. We highly value diversity and strictly prohibit any discrimination based on race, color, national origin, religion, sex (including gender identity and sexual orientation), age, or disability. Our goal is to foster an inclusive culture that appreciates everyone's unique perspectives. Refer to the JPS Human Resources Policy and Procedure documents for detailed guidelines.

6.2 Harassment and Bullying Prevention

JPS promotes a respectful workplace and strictly prohibits all forms of harassment, including sexual harassment, offensive jokes, or intimidating behavior. For more on preventing harassment and bullying, refer to the JPS Human Resources Policy and Procedure document.

6.3 Substance Abuse

We have a zero-tolerance policy for substance abuse. Any use, possession, distribution, or being under the influence of alcohol or illegal drugs on-site is strictly prohibited.

JPS provides an Employee Assistance Program (EAP) and support services for those dealing with addiction. These confidential resources offer guidance and counseling to help individuals overcome substance abuse and enhance overall well-being.

6.4 Professional Appearance and Dress Code

Employees are expected to dress in a manner that reflects the professional nature of their roles. The dress code ensures a clean, neat, and appropriate appearance, conducive to a healthcare environment. Adherence to this dress code promotes a positive workplace image and fosters patient confidence and trust. Specific guidelines regarding professional attire, grooming, and personal hygiene can be found in the JPS Human Resources Policy and Procedure documents.

6.5 Gift Acceptance

All workforce members are prohibited from accepting gifts or entertainment that could seem like bribes. This also includes offering gifts that could influence healthcare decisions. However, small business courtesies and nominal gifts might be allowed in certain situations. If uncertain about gift acceptance, consult the JPS Compliance Department at **817-702-2694**.



6.6 Workplace Violence

JPS is committed to a safe working environment and takes workplace violence very seriously. Workplace violence is any act or threat of physical violence, harassment, intimidation, or other threatening or disruptive behavior that occurs at the work site. It ranges from threats and verbal abuse to physical assaults and even homicide. It can affect and involve employees, patients, customers, and visitors. Workforce members must promptly report any actual or suspected concerns related to workplace violence. Our commitment to a safe and respectful workplace underscores our dedication to providing exceptional care and maintaining a positive work environment for everyone.

To report a workplace violence incident, please scan the QR code to fill out the incident form or you can click on the code.

You may also report workplace violence concerns to your supervisor, JPS Human Resources Department, JPS Compliance Department, or to any executive leader of JPS.

If you or another workforce member have experienced workplace violence, we want to ensure you are connected to the resources you need to heal mind, body, and spirit. Please take a look below at various resources JPS offers:

- Employee Assistance Program (EAP)
  JPS intranet > Staff Resources > Departments A - Z > E > Employee Assistance Program
- Spiritual Care and Ethics
  JPS intranet > Staff Resources > Departments A - Z > S > Spiritual Care and Ethics
- Resilience In Stressful Events (RISE)
  JPS intranet > Staff Resources > Forms A - Z > W > Workplace Violence Form > RISE

6.7 Tobacco-Free Environment

Tobacco use is a major health risk globally. JPS is committed to improving patient health nationwide by maintaining a tobacco and smoke free environment at all JPS owned, leased, and operated property. JPS promotes the good health of its workforce members and provides assistance, should a workforce member wish to change this habit. For more information on our tobacco-free environment and resources, refer to the JPS Human Resources Policy and Procedure documents.



Compliance Reporting and Investigation



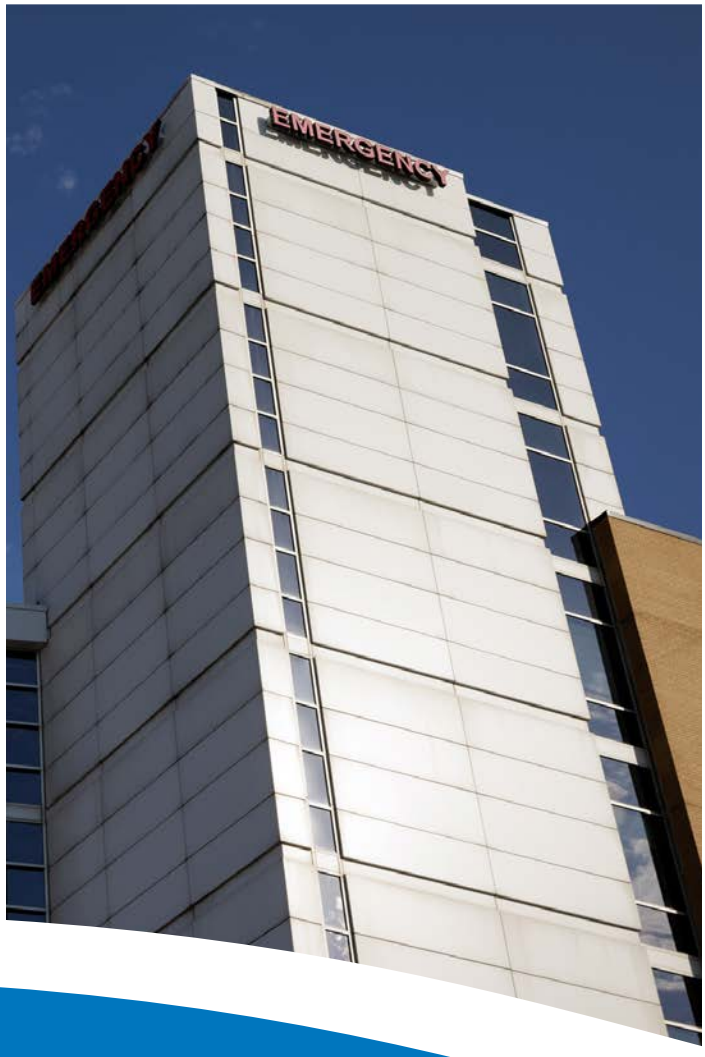


7.1 Reporting Violations and Concerns

Following state laws, federal laws, and our policies is a top priority. The JPS Chief Compliance Officer (CCO) and the Compliance Department ensure this. If anyone notices possible violations of these rules or the Code, we encourage reporting through various channels.

Remember: If you have a **patient safety** concern, report it immediately to the JPS Quality Department at ***Midas***.

jps/Intranet/Departments/Midas.aspx



- **Report to your supervisor, VP, or others in your chain of command**
- **Report directly to the JPS Chief Compliance Officer**
  817-702-3374 or **ext. 23374**
- **Report to the JPS Compliance Department**
  817-702-2694 or **ext. 22694**
  Compliance@jpshealth.org
- **Report to the Compliance Hotline**
  877-373-0125
  (available 24/7, 365 days a year)
- **Submit and file report to the Compliance Hotline Online Reporting**
  by using the link or scanning the QR Code.
  EthicsPoint

For More Information

COM 8100 Reporting Compliance Concerns

COM 8201 Internal Compliance Investigation

Compliance Reporting and Investigation

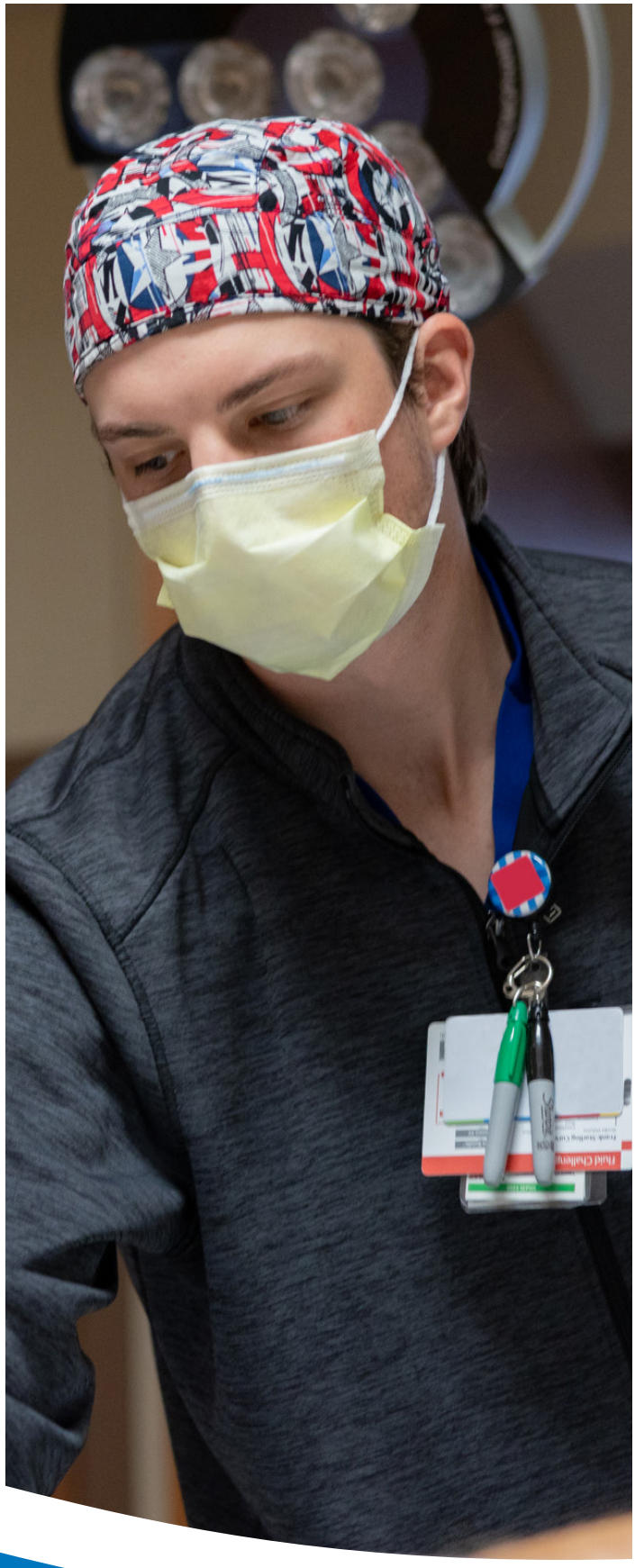
7.2 What to Report

To ensure compliance and accountability, report any concerns about laws, regulations, or JPS policies through our anonymous Compliance Hotline. This includes, but isn't limited to:

- Misconduct of any type
- Patient privacy/HIPAA
- Billing and coding irregularities
- Financial improprieties
- Conflicts of interest
- Fraud, waste, and/or abuse
- Retaliation
- Discrimination
- Harassment
- Unsafe working conditions and environment
- Drug diversion
- Any unethical behavior observed within the organization

We encourage prompt reporting through this confidential channel. Retaliation is strictly prohibited; workforce members reporting issues in good faith or cooperating in an investigation are protected from retaliation.

"Good faith reporting" means honestly providing information about potential violations without malice or ulterior motives.



Our Shared Commitment

We encourage prompt reporting through this confidential channel. Retaliation is strictly prohibited.

Compliance Reporting and Investigation

At JPS, we strive to always do what is right for our patients and our community. However, making the right decision may be difficult. If you find yourself wondering what the proper action would be, use this chart as your guide.



Compliance Reporting and Investigation

Disciplinary Actions





8.1 Disciplinary Process

JPS enforces disciplinary actions thoughtfully and uniformly to ensure adherence to our Code. Violations, whether against our Code or laws, can harm JPS and its patients. If misconduct is reported, a thorough investigation follows. JPS prioritizes fairness, due process, and transparency in the disciplinary action process. Corrective actions, like education, counseling, or termination, tailored to each case, may be taken. Supervisors must report violations or may face disciplinary action. External penalties may include legal actions or fines.

Our Shared Commitment

No Intimidating or Retaliatory Acts

No workforce members will intimidate, coerce, threaten, discriminate against, or take other retaliatory action against an individual for reporting violations in good faith or assisting in a compliance investigation.



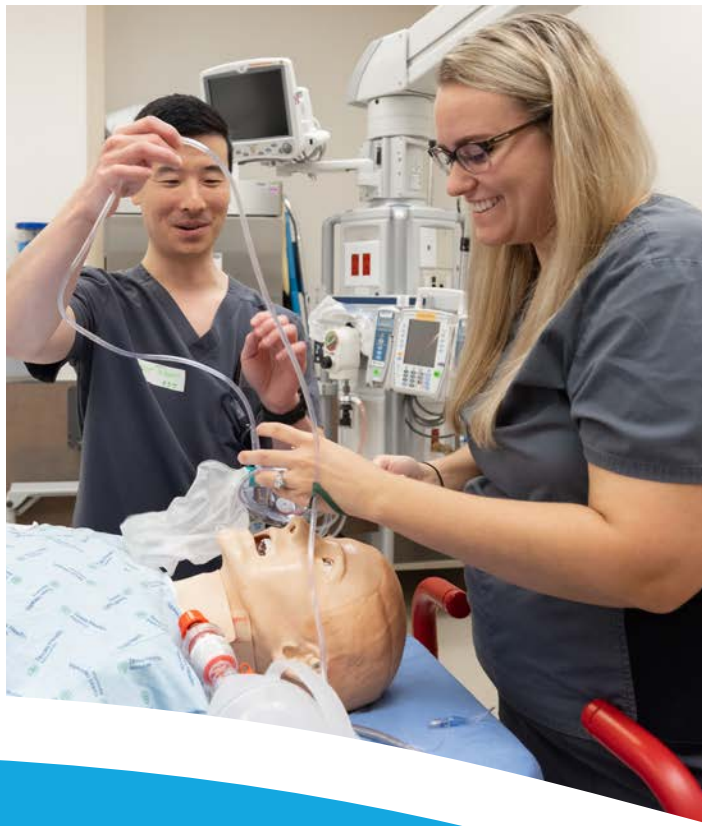
Disciplinary Actions

Education and Training









9.1 Compliance and Code Of Conduct Training

All workforce members receive Compliance and Code of Conduct Training upon hire and annually thereafter. Accessible and engaging training empowers sound decision-making, legal compliance, and exceptional patient care.

9.2 Continuous Learning and Development

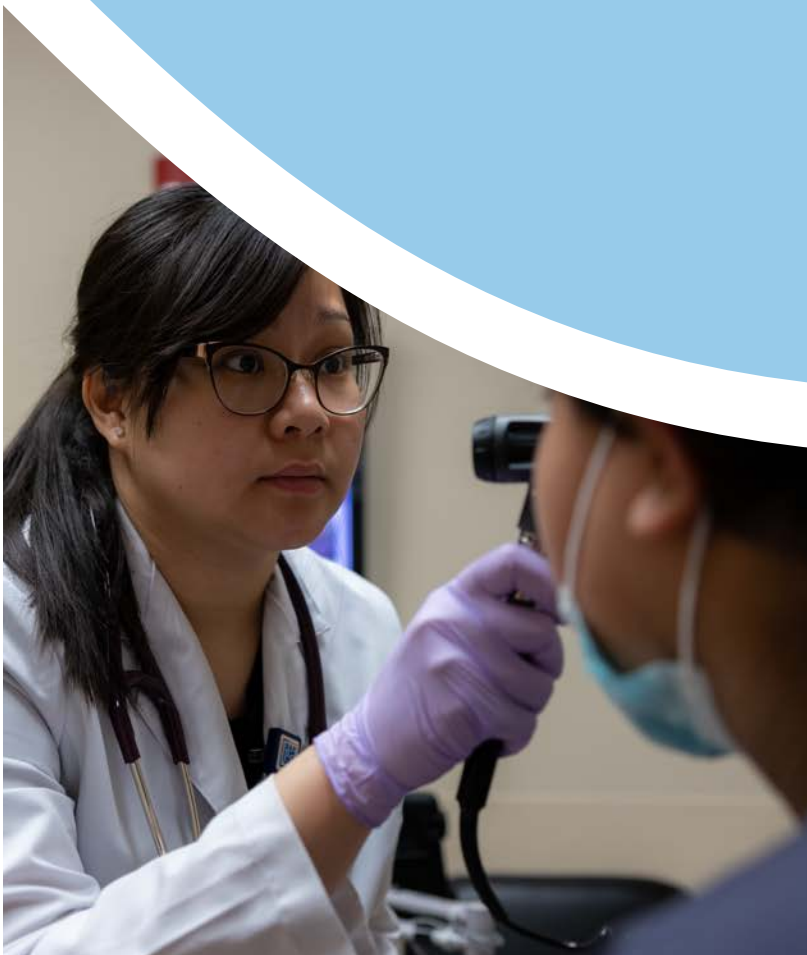
We prioritize and encourage ongoing learning and growth for our workforce members through various learning platforms. We encourage our workforce members to actively pursue learning opportunities fitting their roles.

For More Information

To find out about professional development at JPS, contact Learning & Development at **LearningServices@jpshealth.org**.

Acknowledgement of the Code



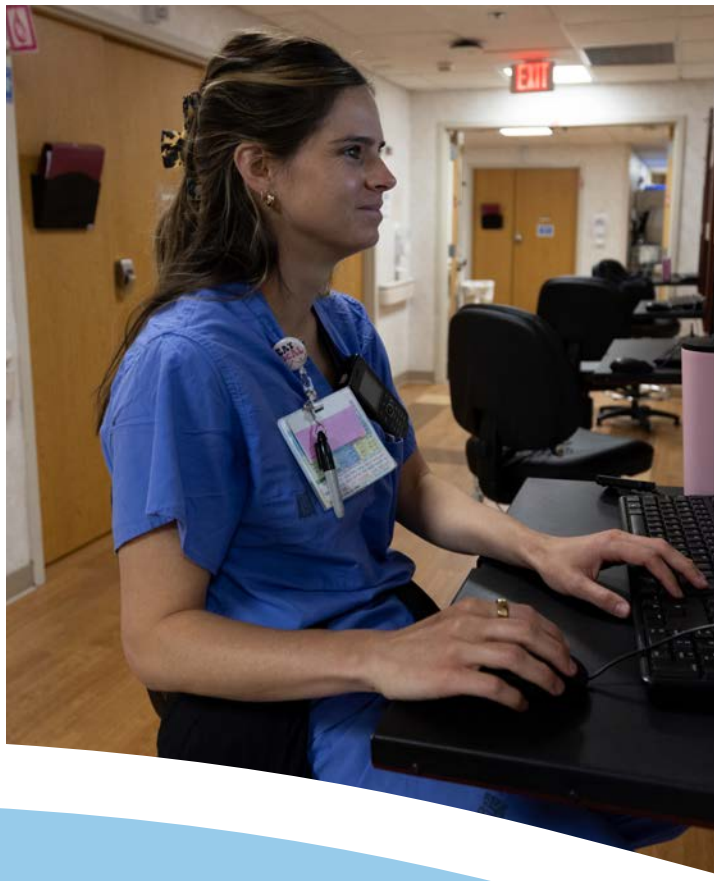


10.1 Acknowledgement

All workforce members must certify that they have read, received, understand their role, and agree to abide by the terms of the JPS Code of Conduct. Certification to the Code attests understanding that the Code serves as a roadmap and guidance to upholding ethical conduct and standards in the workplace. Either through written or computer-based learning attestation, they agree to follow the Code, state and federal laws, and all JPS policies. Onboarding and annual Code training is mandatory, with records kept as per JPS policy and procedure. Adherence to the Code is a factor in employment, promotion, and compensation decisions at JPS.

I, _____ ,

confirm that I have read and received the JPS Code of Conduct. I agree to follow the Code, as well as state, federal laws, and all JPS policies and procedures.





Acknowledgement of the Code

Our Resources





Clinical Research	*jps/Intranet/Departments/OfficeofClinicalResearch.aspx*	
Compliance Department	817-702-2694	Extension 22694
	jps/Intranet/Departments/Compliance.aspx	
Communications Department	817-702-1365	Extension 21365
	jps/Intranet/Departments/Communications.aspx	
Human Resources	817-702-1030	Extension 21030
	jps/Intranet/Departments/HumanResources.aspx	
IT Service Desk	817-702-6222	Extension 26222
Medical Records	817-702-1011	Extension 21011
Patient Experience	817-702-1333	Extension 21333
	jpshn.sharepoint.com/sites/pe/SitePages/Home.aspx	
Patient Safety Hotline (for employees)	817-702-1090	Extension 21090
	jpshn.sharepoint.com/sites/ClinicalRiskRegulatory	
Regulatory Accreditation/Continuous Readiness	817-702-6939	Extension 26939
	jpshn.sharepoint.com/sites/ClinicalRiskRegulatory	